

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

CAROLYN GREENE, on behalf herself
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 03-CV-12628

JOHN G. ESPOSITO, JR., D.D.S., on
behalf himself and all others similarly
situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10013

JOSEPH L. KING, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10038

[Additional Captions Follow on Next Page]

Michael E. CRIDEN, on behalf himself
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10046

ISRAEL SHURKIN and SHARON
SHURKIN on behalf themselves and all
others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10055

JAMES J. NIZZO and VIRGINIA C.
NIZZO, as JOINT TENANTS and CARLO
CILIBERTI, on behalf of themselves and
all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10065

[Additional Captions Follow on Next Page]

BARRY BROOKS, on behalf himself and
all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10077

ANASTASIOS PERLEGIS, on behalf
himself and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10078

MARTIN WEBER, on behalf of himself
and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10090

[Additional Captions Follow on Next Page]

BRUCE HAIMS, on behalf himself and all
others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-10144

MODEL PARTNERS LIMITED, on behalf
themselves and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10155

JUNE E. PATENAUDE, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10179

[Additional Captions Follow on Next Page]

NANCY L. PINCKNEY and GERTRUDE
PINCKNEY, on behalf themselves and all
others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10189

W. KENNETH JOHNSON, on behalf
himself and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10190

GREGORY KRUSZKA, on behalf of
himself and all others similarly situated,

Plaintiff,

v.

BIOPURE CORPORATION, THOMAS
A. MOORE, CARL W. RAUSCH and
RONALD F. RICHARDS,
Defendants.

Civil Action No. 04-CV-10202

NOTICE OF WITHDRAWAL OF MOTION

George Eliopoulos, Dale Self and Mark Mentz, by their counsel, hereby withdraw their
motion for appointment as lead plaintiff, filed with this Court on March 1, 2004. This

withdrawal is without prejudice to Messieurs Eliopoulos's, Self's and Mentz's claims and rights as a member of the proposed class, including the right to share in any recovery or settlement of these actions. It is also conditioned on this Court appointing one or more lead plaintiff[s] from among the individuals that filed lead plaintiff applications on March 1, 2004.

Dated: March 17, 2004

Respectfully submitted,

**BERMAN DEVALERIO PEASE
TABACCO BURT & PUCILLO**

/s/ Patrick T. Egan

Jeffrey C. Block

Patrick T. Egan

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**Attorneys for Plaintiffs George
Eliopoulos, Dale Self and Mark Mentz**